## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DR. THOMAS J. WYLY

Plaintiff,

v.

THE INTERNATIONAL FOUNDATION FOR EDUCATION AND SELF-HELP and THE LEON H. SULLIVAN FOUNDATION,

Defendants.

2004 JUL 16 P 12: 15
US SISTRICT COURT
SISTRICT OF MASS

Case No. 04-11151 EFH

## JOINT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Plaintiff Thomas J. Wyly and Defendant The Leon H. Sullivan Foundation jointly, and through their counsel, move for an extension of time for Defendant The Leon H. Sullivan Foundation to respond to Plaintiff's Complaint until August 6, 2004. The parties are requesting the additional time so that they, along with the Defendant The International Foundation for Education and Self-Help ("IFESH"), whose request for a similar extension was recently granted, can explore the possibilities of settlement, mediation or other means of resolving this matter without further litigation.

WHEREFORE, the Plaintiff Thomas J. Wyly and Defendant The Leon H. Sullivan Foundation jointly request that The Leon H. Sullivan Foundation be granted an extension of time to answer Plaintiff's Complaint until August 6, 2004.

Respectfully submitted,

DR. THOMAS J. WYLY,

By his attorneys:

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Foundation

Dated: July 15, 2004 Dated: July 15, 2004